

BellSouth Telecommunications, Inc.
Legal Department
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Columbia, SC 29201

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Patrick W. Turner
General Counsel-South Carolina

803 401 2900
Fax 803 254 1731

May 11, 2007

The Honorable Charles Terreni
Chief Clerk of the Commission
Public Service Commission of South Carolina
Post Office Drawer 11649
Columbia, South Carolina 29211

Re: AT&T South Carolina's Petition Requesting the Commission's
Intervention in NANPA NXX Code Assignments
Docket No. _____

Dear Mr. Terreni:

BellSouth Telecommunications Inc. d/b/a AT&T South Carolina ("AT&T") respectfully encloses for filing an original and one (1) copy of its Petition for Review of NXX Code Denial in the Greenville Rate Center in the above-captioned matter.

By copy of this letter, I am serving a copy of this document on NANPA, NeuStar, and the ORS, as indicated on the attached Certificate of Service.

Sincerely,



Patrick W. Turner

PWT/nml
Attachment
677439

**THIS DOCUMENT IS AN EXACT DUPLICATE OF THE E-FILED COPY SUBMITTED TO THE
COMMISSION IN ACCORDANCE WITH ITS ELECTRONIC FILING SYSTEM**

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

In Re: AT&T SOUTH CAROLINA’S)
PETITION REQUESTING THE COMMISSION’S) DOCKET NO. _____
INTERVENTION IN NANPA NXX CODE)
ASSIGNMENTS)

PETITION FOR REVIEW OF NXX CODE DENIAL
IN THE GREENVILLE RATE CENTER

BellSouth Telecommunications, Inc. d/b/a AT&T South Carolina (“AT&T”), pursuant to rules adopted by the Federal Communications Commission (“FCC”) for challenging determinations of the North American Numbering Plan Administration (“NANPA”), petitions the Public Service Commission of South Carolina (“Commission”) for review of NANPA’s denial of AT&T’s application for use of central office code numbering resources in the 864 area code. The denial that is the subject of this Petition impacts AT&T’s customer Nelson Mullins Riley & Scarborough LLP.

In support of this petition AT&T states:

1. AT&T is a telephone utility that provides certain services that are regulated by the Commission. Among other things, it provides intraLATA, local exchange telecommunications services in various portions of South Carolina, including the Greenville exchange.
2. NANPA is an independent non-governmental entity that is responsible for administering and managing the North American Numbering Plan (“NANP”). See 47 C.F.R. § 52.13 (a), (b).

3. On March 31, 2000, the FCC issued a Report and Order and Further Notice of Proposed Rule Making relating to numbering resource optimization (“FCC 00-104”). The goal of FCC 00-104 was to implement uniform standards governing requests for telephone numbering resources in order to increase efficiency in the use of existing telephone numbers and to avoid further exhaustion of existing numbers under the NANP.

4. Among other things, FCC 00-104 adopted a revised standard for assessing a carrier’s need for numbering resources by requiring rate center based utilization rates to be reported to NANPA. FCC Order at ¶ 105. The FCC further required that, to qualify for access to new numbering resources, applicants must establish that existing inventory within the applicant’s rate center will be exhausted within six months of the application. The FCC reaffirmed this requirement in two subsequent orders. FCC 00-429 at ¶ 29 (rel. Dec. 29, 2000); FCC 01-362 at ¶¶ 48-49 (rel. Dec. 28, 2001). Prior to this ruling, the Central Office Code Assignment Guidelines, used by the industry and NANPA to make code assignments, required the applicant’s existing number inventory within the applicant’s serving switch to exhaust within six months of the code application or the carrier had to prove that it was unable to meet a specific customer’s request with its current inventory of numbers in order for a code to be assigned.

5. This shift to a “rate center” basis from a switch basis for determining the need for new numbering resources was intended to “more accurately reflect how numbering resources are assigned” and to allow “carriers to obtain numbering resources in response to specific customer demands.” FCC 00-104, ¶ 105.

6. In addition to the months-to-exhaust (“MTE”) requirement described above, the FCC’s rules also required carriers to meet a rate center utilization threshold of 60 percent in

order to receive additional numbering resources in a given rate center. FCC 00-429 at Paragraph 22; FCC 01-362, ¶¶ 50-52. The utilization threshold has increased by five percent per year, and it has now reached the maximum of 75 percent. Based on the FCC's orders, carriers must meet both the six months MTE requirement and the utilization threshold on a rate center basis in order to obtain numbering resources. Id.

7. On or about May 8, 2007, AT&T submitted a Pooling Administration System request to NANPA and NeuStar for the assignment of a one thousand number block with numbers 2XXX within the Greenville wire center to go with the customer's existing dialing plan in the Greenville, South Carolina exchange. These numbers are needed to meet the numbering demands of Nelson Mullins Riley & Scarborough, LLP. This customer is requesting additional telephone numbers to work in conjunction with its existing 864 250-2200-2399 numbers that presently work for the firm's Greenville branch. The firm is growing and expanding the number of attorneys employed in the Greenville office, and the firm desires to have all attorneys and associated personnel have numbers in the -2XXX range. As BellSouth does not have existing numbers to meet the customer's request, one new -2XXX consecutive thousand number block within a new 864-NXX is needed. Exhibit A is a copy of the customer's letter dated November 13, 2006.

8. BellSouth's application was completed in accordance with Industry Numbering Committee's (INC's) and/or NANPA's guidelines, and BellSouth filled out the necessary Month-to-Exhaust Certification Worksheets as required.

9. At the time of the filing of the Code request, the Greenville Rate Center had an MTE of 477.649 months and a utilization of 74.71% (Exhibit B).

10. Thereafter, also on May 8, 2007, NPA's Central Office Code Administration denied BellSouth's request because BellSouth had not met the rate center based MTE criterion now set forth in the Central Office Code (NXX) Guidelines. NANPA denied BellSouth's code requests despite the fact that BellSouth does not have adequate numbering resources needed to satisfy this customer's demands in the Greenville Rate Center. NANPA's response is also included as part of Exhibit B.

11. BellSouth's inability to provide this important customer with the requested numbers prevents BellSouth from providing the quality of service this customer desires, needs, and expects. If BellSouth is not assigned the -2XXX thousand number block needed to meet the customer's request, BellSouth will be unable to provide telecommunications services requested by its customer.¹ NANPA's refusal to grant numbering resources sufficient to meet the needs of this customer is inconsistent with the FCC's position that "(u)nder no circumstances should consumers be precluded from receiving telecommunications services of their choice from providers of their choice for want of numbering resources," FCC 00-429 at ¶ 61.

12. Both the FCC's rules and the Central Office Code (NXX) Assignment Guidelines provide that state regulatory authorities have the power and authority to review NANPA's decision to deny a request for numbering resources. See FCC 01-362, Appendix A, Final Rules, § 52.15(g) (4) ("The carrier may challenge the NANPA's decision to the appropriate state regulatory commission"); FCC 01-362 at ¶¶ 61-66; Central Office Code (NXX) Assignment

¹ BellSouth employs a number administration technique called "sequential numbering" in order to preserve the largest blocks of consecutive numbers for as long as possible. The lack of consecutive numbers in the switch referred to above is the consequence of a high level of utilization, not any failure on BellSouth's part to conserve blocks of consecutive numbers.

Guidelines § 13.0 (“Appeals may include but are not limited to one or more of the following options: . . . C. The CO Code Administrator(s) and code holders/applicants may pursue the disagreement with the appropriate governmental/regulatory body”).

13. Prior to the FCC’s Order and the resulting change in the Central Office Code (NXX) Assignment Guidelines, the MTE procedures used by NANPA permitted a carrier to receive a code assignment, even if the MTE requirement at the switch level was not met. These waivers or exceptions were granted where customer hardships could be demonstrated or where the service provider’s inventory did not have a block of sequential numbers large enough to meet the customer’s specific request. Under today’s procedures, NANPA looks at the MTE for the entire rate center without any exceptions. The FCC has determined, however, that States may grant relief “if a carrier demonstrates that it has received a customer request for numbering resources in a given rate center that it cannot meet with its current inventory.” FCC 01-362, ¶ 64. In addition, the FCC has ruled that, “States...may grant requests for customers seeking contiguous block of numbers.” *Id.*

14. BellSouth requests that the Commission reverse NANPA’s decision to withhold numbering resources from BellSouth on the following grounds:

- a. NANPA’s decision to withhold numbering resources from BellSouth interferes with BellSouth’s ability to provide telecommunication services to its customers as required under South Carolina law; and

- b. BellSouth's request for numbering resources would not materially impact exhaustion of the remaining NXXs available in the 864 area code.²

15. This Commission (see Docket No. 2002 –185-C, Order No. 2002-415) and other state regulatory agencies in Alabama, Florida, Georgia, Louisiana, North Carolina, and Tennessee similarly have recognized their jurisdiction and authority to review NANPA denials and to order the release of number resources to BellSouth to meet customer needs.

WHEREFORE, BellSouth requests that the Commission:

1. Reverse the decision of NANPA to deny BellSouth's request for additional numbering resources;
2. Direct NANPA to provide a new 864-NXX-2XXX one thousand number block for the Greenville, South Carolina Rate Center; and
3. Grant the requested relief as soon as possible.

Respectfully submitted this 11th day of May, 2007.



Patrick W. Turner
Suite 5200
1600 Williams Street
Columbia, South Carolina 29201
(803) 401-2900

ATTORNEY FOR AT&T SOUTH CAROLINA

² This count is as of February 28, 2005, the most current data published by NANPA.

Exhibit A

Nelson Mullins

Nelson Mullins Riley & Scarborough LLP
Attorneys and Counselors at Law
1320 Main Street / 17th Floor / Columbia, South Carolina 29201
Tel: 803.799.2000 Fax: 803.256.7500
www.nelsonmullins.com

Rick Gibbons
Telecommunications Manager
803-255-9464

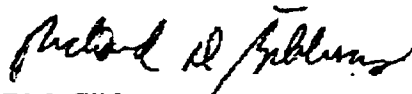
November 13, 2006

Grady,

We are running short on numbers for both our Greenville and Atlanta offices. We would like to investigate the possibility of reserving new blocks of numbers for these offices. We have been in these cities for quite some time, so I do not expect to be able to get more number sin the same range that we currently have.

In Greenville our current numbers are 864-250-2200-2399 and in Atlanta our current numbers are 404-817-6000-6599. In each of these locations we would like to reserve a full block of 1000 numbers. We would also like to retain the current numbers 2xxx in Greenville, and 6xxx in Atlanta to minimize the impact of this change. Also, the Atlanta office would prefer to keep their numbers in the 404 area code if at all possible.

Thanks,



Rick Gibbons

Exhibit B

Pooling Administration System

 [brenda.a.cunningham@bridge.bellsouth.com \(SP\)](#)

[Sign Out](#)

Request Resources

State	<input type="text" value="SOUTH CAROLINA"/>
NPA	<input type="text" value="864"/>
Rate Center	<input type="text" value="GREENVILLE"/>
OCN	<input type="text" value="9417-BELLSOUTH SO BELL"/>
Type of Application	<input type="text" value="Application for Individual Blocks"/>
Quantity of Blocks Requested	<input type="text" value="1"/>

[Continue](#)

NOTE:

If you are selecting a Rate Center that is moving to a new NPA due to a split, PAS will automatically migrate the request to the new NPA once the mandatory dialing date occurs.

Pooling Administration System

 [brenda.a.cunningham@bridge.bellsouth.com \(SP\)](#)

[Sign Out](#)

Part 1A

Type of Application : New

1.1 Contact Information :

Note: If any of the contact info is incorrect, edit your user profile.

Block Applicant :

Company Name **BELLSOUTH SO BELL**
Headquarters Address: **3535 Colonnade Parkway, W2B**
City: **Birmingham**
State: **AL**
Zip: **35243**

Contact Name **Ms Brenda A Cunningham**
Contact Address **3535 Colonnade Parkway, W2B**

City **Birmingham**

Zip **35243**

State **AL**

Telephone **(205) 968-8704**

Fax **(205) 977-3013**

E-mail **brenda.cunningham@bellsouth.com**

Pooling Administrator ⁱⁱ:

Contact Name **Ms Dora Wirth**

Contact Address **1800 Sutter St. Ste. 780**

City **Concord**

State **CA**

Zip **94520**

Telephone **(925) 363-8706**

Fax **(925) 363-7684**

E-mail **dora.wirth@neustar.com**

1.2 General Information

LRN Needed ⁱⁱⁱ **No**

NPA **864**

LATA * **430**

OCN ^{iv} * **9417-BELLSOUTH SO BELL**

Parent Company OCN * **9417**

Number of Thousands-
Blocks Requested **1**

Switch Identification
(Switching Identity/POI) ^v * **GNVLSCT23F**

Rate Center ^{vi} **GREENVILLE**

City or Wire
Center Name

Rate Center
Sub Zone

1.3 Dates

Date of Application ^{vii} **Tuesday, May 8, 2007**

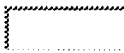
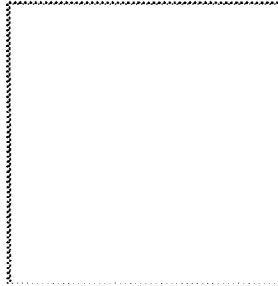

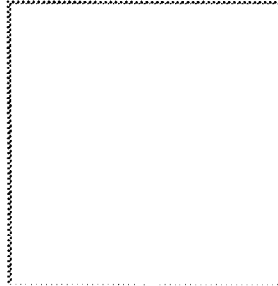
Requested Block
Effective Date ^{viii} **8 Jun 2007**

Request Expedited
Treatment ☒ Yes ☐ No

1.4 Type of Service Provider Requesting the Thousands-Block

a) Type of Service
Provider * **Incumbent Local Exchange Carrier (ILEC)**

b) Primary type of service
Blocks to be used for * **Wireline**

<p>c) Thousands-Block(s) (NPA-NXX-X) assignment preference Click here to see the available blocks in the pool.</p> <p>NOTE: The blocks available list shows blocks that are available at the time a request is submitted. These same blocks may not be available at the time the request is processed. Therefore, it is recommended that you provide additional block preferences in the event those blocks are not available.</p>			
<p>d) Thousands-Block(s) (NPA-NXX-X) that are undesirable for this assignment, if any</p>			

e) If requesting a code for LRN purposes, indicate which block(s) you will be keeping (the remainder of the blocks will be given to the pool) **N/A**

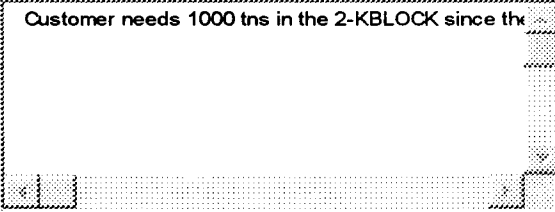
1.5 Type of Request

Initial block for rate center ☐ Yes

Growth block for rate center ☒ Yes

Change block **N/A**

Disconnect block **N/A**

Remarks 

I hereby certify that the above information requesting an NXX-X block is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block (NXX-X) Pooling Administration Guidelines (ATIS-0300066)

Instructions for filling out each Section of the Part 1A form:

Section 1.1 Contact information requires that Service Providers supply under "Block Applicant" the company name, company headquarters address, a contact within the company, an address where the contact person may be reached, in addition to the correct phone, fax, and e-mail address. The Pooling Administrator section also requires the Service Provider to fill in the Pooling Administrator's name, address, phone, fax and e-mail.

Section 1.2 Service Providers who need a thousands-block assignment or for an Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a CO Code Application needs to also be submitted to the PA. The Service Provider should supply the Numbering Plan Area (NPA); the Local Access Transport Area (LATA), which is a three-digit number that can be found in the TelcordiaTM LERGTM Routing Guide. The Operating Company Number (OCN) assigned to the service provider and the OCN its parent company. An OCN is a four-character alphanumeric assigned by TelcordiaTM Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification as well as the city or wire center name, rate center, rate center sub zone, homing tandem and CLLITM tandem of the facilities based provider^x. Explanations of these terms may be found in the footnotes.

Section 1.3 The date the Service Provider completes the application should be entered in this section, as well as the Effective Date of the requested thousands-block.

Section 1.4 Service Providers should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMRS. The also indicate the primary type of business in which the numbering resource is to be used. Service Providers also may indicate their preference for a particular thousands-block, e.g., 321-9XXX, or indicate any thousands-blocks that may be undesirable, e.g., 321-6XXX.

Section 1.5 Service Providers indicate the type of request. Initial requests are for first applications for thousands-blocks in a rate center, growth for additional thousands-blocks in a rate center in which the applicant already has numbering resources, and provide the required evidence as ordered by the FCC.

The thousands-block applicant certifies veracity of this form by signing their name, and providing their title and date.

Foot Notes:

ⁱ Identify type of and reason for change(s) in Section 1.5.

ⁱⁱ The Pool Administrator is available to assist in completing these forms.

ⁱⁱⁱ A CO Code application will also need to be submitted to the PA.

^{iv} Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments should contact NECA (800 524-1020) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to (TRA) (732-699-6700).

^v This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLITM code of the switch /POI.

^{vi} Rate Center name must be a tariffed Rate Center.

^{vii} Acknowledgment and indication of disposition of this application will be provided to applicant within seven calendar days from the date of receipt of this application. An incomplete form may result in delays in processing this request.

^{viii} Please ensure that the NPA-NXX of the LRN to be associated with this block(s) is/will be active in the network prior to the effective date of the block(s).

ix

Pooling Administration System

Sign Out

Months to Exhaust and Utilization Certification Worksheet - TN Level 1


Date Tuesday, May 8, 2007

OCN 9417

Company Name **BELLSOUTH SO BELL**

Rate Center **GREENVILLE**

**List all Codes NPA(s)-NXXs and Blocks
NPA(s)-NXX-X(s)**



Name of Block Applicant **Ms Brenda A Cunningham**

Title Facility Assignment Specialist

Telephone Number **(205) 968-8704**

Fax Number (205) 977-3013

E-Mail brenda.cunningham@bellsouth.com

A. Available Numbers *	80086
------------------------	-------

B. Assigned Numbers * 352189

C. Total Numbering Resources *	471379
--------------------------------	--------

D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation *

List excluded Code(s) or Block(s)

0-1; 3-9

E. Growth History - Previous 6 months² *

Month 1	-1780	Month 2	-1583
Month 3	-3617	Month 4	-1883
Month 5	-1554	Month 6	-1560

F. Forecast - Next 12 months³ *

Month 1	1	Month 2	1001
Month 3	1	Month 4	1
Month 5	1	Month 6	1
Month 7	1	Month 8	1
Month 9	1	Month 10	1
Month 11	1	Month 12	1

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6) **167.667**

H. Months to Exhaust⁴ (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (G))

Block Requested	A. Available Numbers	H. Months to Exhaust
1	80086	477.649

I. Utilization⁵(Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers (D)) * 100 **74.715**

Explanation

Nelson Mullins needs 1000 tns in the 2KBLOCK since

¹A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering resources in a rate center. For auditing purposes, the applicant must retain a copy of this document.

²Net change in TNs no longer available for assignment in each previous month, starting with the most distant month as Month #1, and Month #6 as the current month.

³Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

⁴To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, § 52.15 (g)(3)(iii)).

⁵Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

Continue

Pooling Administration System

 brenda.a.cunningham@bridge.bellsouth.com (SP)

Sign Out

Months to Exhaust and Utilization Certification Worksheet - TN Level (Continued)

Your utilization calculates to **74.715 percent**. The FCC requires a utilization of **75.000 percent**.

Select One Option and Submit

- ☒ Return to the Months To Exhaust Form
- ☐ Discard all the information provided for the request and start with a fresh Part 1A
- ☐ State Waiver Option

Submit

Pooling Administration System

 brenda.a.cunningham@bridge.bellsouth.com (SP)

[Sign Out](#)

Request Resources

State	<input type="text" value="SOUTH CAROLINA"/>
NPA	<input type="text" value="864"/>
Rate Center	<input type="text" value="GREENVILLE"/>
OCN	<input type="text" value="9417-BELLSOUTH SO BELL"/>
Type of Application	<input type="text" value="Application for Individual Blocks"/>
Quantity of Blocks Requested	<input type="text" value="1"/>

[Continue](#)

NOTE:

If you are selecting a Rate Center that is moving to a new NPA due to a split, PAS will automatically migrate the request to the new NPA once the mandatory dialing date occurs.

Pooling Administration System

 brenda.a.cunningham@bridge.bellsouth.com (SP)

[Sign Out](#)

Part 1A

Type of Application : New

1.1 Contact Information :

Note: If any of the contact info is incorrect, edit your user profile.

Block Applicant :

Company Name **BELLSOUTH SO BELL**
Headquarters Address: **3535 Colonnade Parkway, W2B**
City: **Birmingham**
State: **AL**
Zip: **35243**

Contact Name **Ms Brenda A Cunningham**
Contact Address **3535 Colonnade Parkway, W2B**

City **Birmingham**

State **AL**

Zip **35243**

Telephone **(205) 968-8704**

Fax **(205) 977-3013**

E-mail **brenda.cunningham@bellsouth.com**

Pooling Administrator ⁱⁱ:

Contact Name **Ms Dora Wirth**

Contact Address **1800 Sutter St. Ste. 780**

City **Concord**

State **CA**

Zip **94520**

Telephone **(925) 363-8706**

Fax **(925) 363-7684**

E-mail **dora.wirth@neustar.com**

1.2 General Information

LRN Needed ⁱⁱⁱ **No**

NPA **864**

LATA * **430**

OCN ^{iv}* **9417-BELLSOUTH SO BELL**

Parent Company OCN * **9417**

Number of Thousands-
Blocks Requested **1**

Switch Identification
(Switching Identity/POI) ^v* **GNV/LSCDT23F**

City or Wire
Center Name

Rate Center ^{vi} **GREENVILLE**

Rate Center
Sub Zone

1.3 Dates

Date of Application ^{vii} **Tuesday, May 8, 2007**

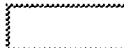
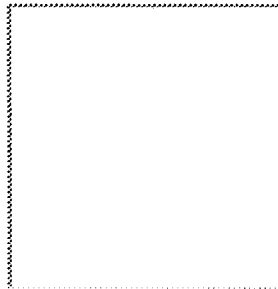
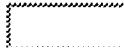
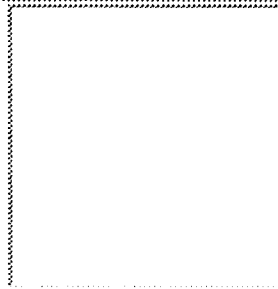
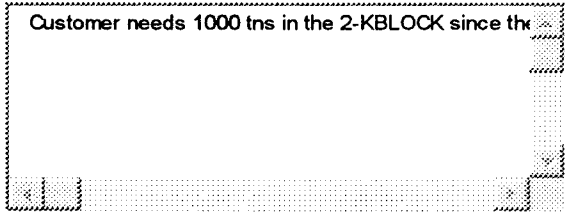
Requested Block
Effective Date ^{viii} **8 Jun 2007**

Request Expedited
Treatment ☒ Yes ☐ No

1.4 Type of Service Provider Requesting the Thousands-Block

a) Type of Service
Provider * **Incumbent Local Exchange Carrier (ILEC)**

b) Primary type of service
Blocks to be used for * **Wireline**

<p>c) Thousands-Block(s) (NPA-NXX-X) assignment preference</p> <p>Click here to see the available blocks in the pool.</p> <p>NOTE: The blocks available list shows blocks that are available at the time a request is submitted. These same blocks may not be available at the time the request is processed. Therefore, it is recommended that you provide additional block preferences in the event those blocks are not available.</p>			
<p>d) Thousands-Block(s) (NPA-NXX-X) that are undesirable for this assignment, if any</p>			
<p>e) If requesting a code for LRN purposes, indicate which block(s) you will be keeping (the remainder of the blocks will be given to the pool) N/A</p>			
<p>1.5 Type of Request</p>			
<p>Initial block for rate center <input type="radio"/> Yes</p> <p>Growth block for rate center <input checked="" type="radio"/> Yes</p> <p>Change block N/A</p> <p>Disconnect block N/A</p>			
<p>Remarks </p>			
<p>I hereby certify that the above information requesting an NXX-X block is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block (NXX-X) Pooling Administration Guidelines (ATIS-0300066)</p>			

Instructions for filling out each Section of the Part 1A form:

Section 1.1 Contact information requires that Service Providers supply under "Block Applicant" the company name, company headquarters address, a contact within the company, an address where the contact person may be reached, in addition to the correct phone, fax, and e-mail address. The Pooling Administrator section also requires the Service Provider to fill in the Pooling Administrator's name, address, phone, fax and e-mail.

Section 1.2 Service Providers who need a thousands-block assignment or for an Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a CO Code Application needs to also be submitted to the PA. The Service Provider should supply the Numbering Plan Area (NPA); the Local Access Transport Area (LATA), which is a three-digit number that can be found in the TelcordiaTM LERGTM Routing Guide. The Operating Company Number (OCN) assigned to the service provider and the OCN its parent company. An OCN is a four-character alphanumeric assigned by TelcordiaTM Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification as well as the city or wire center name, rate center, rate center sub zone, homing tandem and CLLITM tandem of the facilities based provider^x. Explanations of these terms may be found in the footnotes.

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The thousands-block applicant certifies veracity of this form by signing their name, and providing their title and date.

Foot Notes:

ⁱ Identify type of and reason for change(s) in Section 1.5.

ⁱⁱ The Pool Administrator is available to assist in completing these forms.

ⁱⁱⁱ A CO Code application will also need to be submitted to the PA.

^{iv} Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments should contact NECA (800 524-1020) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to (TRA) (732-699-6700).

^v This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLITM code of the switch /POI.

^{vi} Rate Center name must be a tariffed Rate Center.

^{vii} Acknowledgment and indication of disposition of this application will be provided to applicant within seven calendar days from the date of receipt of this application. An incomplete form may result in delays in processing this request.

^{viii} Please ensure that the NPA-NXX of the LRN to be associated with this block(s) is/will be active in the network prior to the effective date of the block(s).

^{ix} Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

Pooling Administration System

 brenda.a.cunningham@bridge.bellsouth.com (SP)

Sign Out

Months to Exhaust and Utilization Certification Worksheet - TN Level 1


Date Tuesday, May 8, 2007

OCN 9417

Company Name **BELLSOUTH SO BELL**

Rate Center **GREENVILLE**

**List all Codes NPA(s)-NXXs and Blocks
NPA(s)-NXX-X(s)**



Name of Block Applicant **Ms Brenda A Cunningham**

Title Facility Assignment Specialist

Telephone Number **(205) 968-8704**

Fax Number (205) 977-3013

E-Mail brenda.cunningham@bellsouth.com

A. Available Numbers * 80086

B. Assigned Numbers * 352189

C. Total Numbering Resources *	471379
--------------------------------	--------

D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation *

0

List excluded Code(s) or Block(s)

0-1; 3-9

E. Growth History - Previous 6 months² *

Month 1	-1780	Month 2	-1583
Month 3	-3617	Month 4	-1883
Month 5	-1554	Month 6	-1560

F. Forecast - Next 12 months³ *

Month 1	1	Month 2	1001
Month 3	1	Month 4	1
Month 5	1	Month 6	1
Month 7	1	Month 8	1
Month 9	1	Month 10	1
Month 11	1	Month 12	1

G. Average Monthly Forecast (Sum of months # 1-6 (Part F above) divided by 6) **167.667**

H. Months to Exhaust ⁴ (Numbers Available for Assignment to customers (A) / Average Monthly Forecast (G))

Block Requested	A. Available Numbers	H. Months to Exhaust
1	80086	477.649

I. Utilization⁵ (Assigned Numbers (B)) / (Total Numbering Resources (C) - Excluded Numbers (D)) * 100 **74.715**

Explanation

Nelson Mullins needs 1000 tns in the 2KBLOCK since

¹A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering resources in a rate center. For auditing purposes, the applicant must retain a copy of this document.

²Net change in TNs no longer available for assignment in each previous month, starting with the most distant month as Month #1, and Month #6 as the current month.

³Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

⁴To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, § 52.15 (g)(3)(iii)).

⁵Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

Continue

Pooling Administration System

 brenda.a.cunningham@bridge.bellsouth.com (SP)

Sign Out

Months to Exhaust and Utilization Certification Worksheet - TN Level (Continued)

Your utilization calculates to **74.715 percent**. The FCC requires a utilization of **75.000 percent**.

Select One Option and Submit

- ☒ Return to the Months To Exhaust Form
- ☐ Discard all the information provided for the request and start with a fresh Part 1A
- ☐ State Waiver Option

Submit

STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND) CERTIFICATE OF SERVICE

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for AT&T South Carolina (“AT&T”) and that she has caused AT&T’s Petition for Review of NXX Code Denial in the Greenville Rate Center to be served by the method indicated below upon the following this May 11, 2007:

Thomas C. Foley
NPA Relief Planner – Eastern Region NANPA
NeuStar – NANPA
820 Riverbend Blvd.
Longwood, FL 32779-2327
(U. S. Mail)

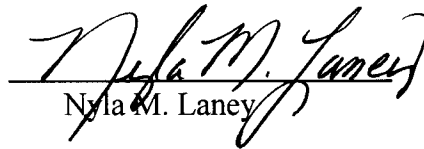
Ms. Kimberly Miller
Regulatory Policy Attorney
NeuStar
2000 M Street, NW, Suite 600
Washington, DC 20036-3328
(U. S. Mail)

F. David Butler, Esquire
General Counsel
S. C. Public Service Commission
Post Office Box 11649
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Nyla M. Laney

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